

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

United States of America,

Plaintiff,

vs.

Steven P. McDonald,

Defendant.

) Case No. 5:17-CR-451

)

) Judge Solomon Oliver, Jr.

)

)

) **DEFENDANT'S UNOPPOSED¹**

) **MOTION TO MODIFY CONDITIONS**

) **OF RELEASE**

)

)

Now comes Defendant Steven P. McDonald, by and through undersigned counsel, and hereby moves the Court for an order modifying the conditions of Mr. McDonald's release. Specifically, Mr. McDonald asks the Court to modify paragraph seven of his conditions (see Doc. 3-1 at Page ID # 20) so that Mr. McDonald may travel to Wisconsin for work on December 19-20 as well as January 3-5. Mr. McDonald would make the trips via car.

As the Court is aware, restitution is a component of this case. As such, these business trips will help Mr. McDonald remain gainfully employed, which, in turn, will assist him in attempting to make restitution once finally ordered by this Court.

Finally, Mr. McDonald requests that the Court allow him to travel by car to Tennessee from December 26-31. This Tennessee trip was planned with Mr. McDonald's wife prior to the date of Mr. McDonald's plea and will likely be the last extended trip with his family that Mr. McDonald will be taking for some time. Mr. McDonald, therefore, asks the Court for leniency in allowing him to take this pre-planned holiday trip.

¹ Defendant obtained electronic mail permission from Mr. Robert J. Patton of the USAO to file this motion "unopposed."

Accordingly, Mr. McDonald asks the Court to find his unopposed motion well taken, grant it for good cause shown, and allow him to travel outside the District on the requested dates.

Respectfully submitted,

/s/ David L. Harvey III
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CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2017, a copy of the foregoing was filed electronically. Notice of this filing will be sent to counsel for all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ David L. Harvey III
Counsel for Defendant